

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE WACHOVIA CORPORATION ERISA LITIGATION	MASTER FILE: 08 Civ. 5320 (NRB)
THIS DOCUMENT RELATES TO: All Actions	

DECLARATION OF DEREK W. LOESER IN SUPPORT OF PLAINTIFF TODD A.
WRIGHT'S MOTION TO APPOINT INTERIM LEAD PLAINTIFFS, INTERIM LEAD
COUNSEL AND FOR ENTRY OF PRETRIAL ORDER NO. 1

DEREK W. LOESER declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the firm of Keller Rohrbach L.L.P., co-counsel of record for Plaintiff Todd A. Wright. I am licensed to practice law in the State of Washington. I submit this Declaration in support of Plaintiff Todd A. Wright's Motion to Appoint Interim Lead Plaintiffs, Appoint Interim Lead Counsel and for Entry of Pretrial Order No. 1. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

1. Attached as Exhibit 1 is a true and correct copy of the *Annotated Manual for Complex Litigation* (4th ed. 2008) §§ 10.22, 40.22.

2. Attached as Exhibit 2 is a true and correct copy of *In re Polaroid ERISA Litig.*, No. 04-8335 (S.D.N.Y. Mar. 5, 2004).

3. Attached as Exhibit 3 is a true and correct copy of *In re WorldCom, Inc. ERISA Litigation*, No. 02-4816 (S.D.N.Y. Sep. 18, 2002).

4. Attached as Exhibit 4 is a true and correct copy of the Keller Rohrbach L.L.P. ERISA Group resume.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2008 in Seattle, Washington.

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